Frequently Asked Questions

Why is testing required?

Testing for priority pollutants is required by the Policy for Implementation of Toxic Standards for Inland Surface Waters, Enclosed Bays, and Estuaries of California, also known as the State's Implementation Policy (SIP). The California Toxics Rule (CTR) issued by U.S. EPA emphasized early in its preamble that California had been the only state in the nation for which Clean Water Act Section 303(c)(2)(B) water quality standards for priority pollutants had remained substantially unimplemented. The CTR promulgated water quality-based criteria for priority pollutants. The SIP provides the implementation provisions for priority pollutant criteria and as such established a standardized approach as statewide policy for permitting discharges of toxic pollutants to non-ocean waters. Specific direction for the collection of priority pollutant data associated with NPDES discharges can be found in Section 1.2 of the SIP. The data must be sufficient to conduct the reasonable potential analysis in Section 1.3 (Determination of Priority Pollutants Requiring Water Quality-Based Effluent Limitations). If such effluent limitations are required by that analysis, the data must also be sufficient to apply to Section 1.4 (Calculation of Effluent Limitations).

Who has to do the testing?

Unless categorically and/or specifically exempted by the Regional Board all NPDES dischargers must do the testing. The sunset for such dischargers to provide the data is emphasized in Section 1.2 as not to exceed three years from the effective date of the SIP (which was May 18, 2000). It is the discharger's responsibility to provide all data and other information requested by the Regional Water Quality Control Board (RWQCB) before the issuance, reissuance, or modification of a permit to the extent feasible.

What labs are available to do the testing?

Unfortunately, specific labs cannot be recommended by name. The State Water Resources Control Board is continuing its review of labs that claim to be able to satisfy Minimum Levels (MLs) described in Section 2.4 Reporting Requirements. Such reporting requirements become important for determining compliance with effluent limitations developed for priority pollutants. It is recommended but not required that labs be able to meet MLs for the purposes of gathering data to satisfy Sections 1.3 and 1.4.

How much does it cost?

Lab prices will vary by the individual lab and by test method, and possibly by quantity of samples to be analyzed. The following are very rough prices for typical required analyses.

Volatile organics -	$150
Semi-volatiles -	$150
Metals (each) except As, Se, Hg -	$15

As, Se, Hg (each) -	$20
CN, Phenol (each) -	$25
Pesticides -	$150
PCBs -	$150
Dioxin/Furans -	$1200
Total approximately -	$2000

What are the lab results used for?

Lab results from effluent data are used for reasonable potential determination in Section 1.3, step 3 (see page 4). The coefficient of variation (CV) from effluent data is also used in establishing effluent limitations where Table 1 and Table 2 are used in setting effluent limitations in Section 1.4 B, steps 3 and 5 (see pages 6-9).

Lab results from ambient data are used for reasonable potential determination in Section 1.3, steps 5 and 6 (see page 4). Ambient data is also used for the calculation of effluent limitations in the steady-state mass balance equation in Section 1.4 B, step 2 (see page 6). That data becomes of use if a mixing zone and dilution credit will be considered by the RWQCB. If a mixing zone and dilution credit will not be considered by the RWQCB for any priority pollutant, the ambient data is still required by the fore-mentioned reasonable potential determination in steps 5 and 6. A final use of ambient data is if intake water credits are being considered under Section 1.4.4 (see pages 17-18). In that case, certain intake water concentrations are also required.

Note that in addition to effluent data required by Section 3 for all dioxin/furan congeners, ambient data for 2,3,7,8-TCDD will be required to perform reasonable potential analysis under Section 1.3 and possibly to establish effluent limitations if necessary under Section 1.4 B. This is because 2,3,7,8-TCDD is a priority pollutant established by the CTR.

With the exception of dioxin/furan congener monitoring requirements detailed by Section 3, the frequency of data collection will be to the discretion of RWQCBs as specified in Water Code Section 13267 letters issued to dischargers. Dischargers have the option to collect data over and beyond such minimum requirements. For example, there may be instances when a better understanding of effluent variability is desired so that default values of CV do not have to be used in the development of effluent limitations (see step 3, page 6). Dischargers also have the option of using as sensitive a lab method as allowed to obtain effluent and ambient data. The incentive for doing so is for the special case if all samples are below reported detection limits, where the respective maximum effluent concentration or ambient background concentration will be set equal to the lowest of individual reported detection limits.

Can I obtain a copy of the State Implementation Policy?

Yes, you can obtain a copy of the SIP by accessing the State Water Resources Control Board Web Site at http://www.swrcb.ca.gov/iswp/index.htm